

## REMARKS

Claims 1-24 were rejected. Claims 13 and 19 have been amended and claim 20 has been canceled. Reconsideration and allowance are respectfully requested.

### *Specification*

The title has been objected to as not being descriptive and clearly indicative of the invention to which the claims are directed.

Applicant has amended the title to specify that the network subnet that is relocated is routable and that the patent is directed to systems and methods of this type. Applicant has also amended independent claims 13 and 19 to specify the routable and relocatable aspects of the invention. The title is therefore descriptive and clearly indicative of the invention to which the claims are directed.

### *Claim rejections 35 USC § 102*

Claims 1-10 and 13-22 have been rejected under 35 U.S.C. 102(e) as being anticipated by Cheline et al. (7,197,550) (“Cheline”). Claim 13 and 19 have been amended and claim 20 has been cancelled. Reconsideration and allowance are respectfully requested.

Claim 1 is directed to a method for relocating a network subnet to a remote location. To accomplish this, a block of routable network addresses is allocated for use in the relocated network subnet. A link from the network subnet to the relocated network subnet is established. One or more services at the relocated network subnet are configured.

One application of this invention is to convert a private (i.e., non-public) subnet of network addresses at a first location into routable (i.e., public) addresses so that services at the first location can be publicly accessed. This invention does so by allocating a block of routable (i.e., public) network address of a subnet at a second location and establishing a link from the network subnet at the second location to the relocated network subnet at the first location. Services at the relocated network subnet are then configured. The service at the first location can then be publicly accessed by addressing them through the block of routable addresses at the second location. This is referred to “relocating a network subnet” because the routable (i.e.,

public) address of the subnet at the second location are effectively relocated to the first location so that they can be associated with one or more services that are provided at the first location.

Cheline describes a fundamentally different type of system. Cheline configures a virtual private network automatically. Cheline does not, as required by claim 1, allocate a block of routable network addresses for use in a relocated network subnet. Indeed, Cheline does not even appear to be concerned with relocating a network subnet. Should the Examiner continue to contend otherwise, applicant would be grateful to receive a citation to the specific portions in Cheline that purportedly disclose such a feature, as well as an explanation as to why such a disclosure anticipates this claim element.

Cheline similarly fails to disclose establishing a link from the network subnet to the relocated network subnet. Indeed, not even the Examiner has expressly stated otherwise.

Claims 13 and 19 have been amended to recited limitations similar to those which distinguish claim 1 from Cheline as discussed above. Claims 13 and 19 are also therefore not anticipated by Cheline.

Claims 2-10 and 14-19 and 21- 22 are dependent upon claims 1, 13 or 19 and are therefore also not anticipated by Cheline.

### *Claim rejections 35 USC § 103*

Claim 11 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Cheline as applied to claim 1 above in view of Spacey (2002/0038371). However, Spacey does not make up for the deficiencies of Cheline as explained above in connection with claim 1. Thus, claim 11 is patentable over Cheline in view of Spacey.

Claims 12, 23, and 24 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Cheline as applied to claims 1 and 19 above in view of Das et al. (6,992,994). However, Das et al. does not make up for the deficiencies of Cheline as explained above in connection with claim 1 and amended claim 19. Thus, claims 12, 23, and 24 are patentable over Cheline in view of Das et al.

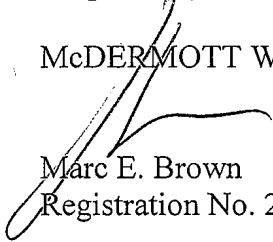
### CONCLUSION

For the foregoing reasons, Applicant respectfully submits that the above amendment places this application in condition for allowance, which Applicant respectfully solicits.

Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 501946 and please credit any excess fees to such deposit account and reference attorney docket no. 28080-107.

Respectfully submitted,

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